

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL

OFFICE OF AIR QUALITY

**Phillips Pipe Line Company
3230 N. Raceway Road
Clermont, Indiana 46234**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F063-13882-00011	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 14, 2001 Expiration Date: September 14, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary petroleum products terminal.

Authorized individual:	Dave Ysebaert
Source Address:	3230 N. Raceway Road, Clermont, Indiana 46234
Mailing Address:	P.O. Box 34176, Clermont, Indiana 46234
General Source Phone Number:	(918)661-0301
SIC Code:	5171
Source Location Status:	Hendricks
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

One (1) petroleum product loading rack, constructed in 1979, with VOC emissions controlled by a vapor combustion unit, which was installed in 1994.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) One (1) internal floating roof storage tank, identified as 031, constructed in 1954, storing transmix, with a capacity of 2,851 barrels;
 - (2) One (1) internal floating roof storage tank, identified as 201, constructed in 1953, storing kerosene, with a capacity of 17,973 barrels;
 - (3) One (1) internal floating roof storage tank, identified as 202, constructed in 1953, storing av-gasoline, with a capacity of 17,720 barrels;
 - (4) One (1) internal floating roof storage tank, identified as 203, constructed in 1953, storing av-gasoline, with a capacity of 12,500 barrels;
 - (5) One (1) internal floating roof storage tank, identified as 204, constructed in 1953, storing regular unleaded gasoline, with a capacity of 17,723 barrels;

- (6) One (1) fixed roof storage tank, identified as 401, constructed in 1953, storing #2 distillate oil with a high sulfur content, with a capacity of 41,679 barrels;
- (7) One (1) internal floating roof storage tank, identified as 402, constructed in 1953, storing premium unleaded gasoline, with a capacity of 38,812 barrels;
- (8) One (1) fixed roof storage tank, identified as 403, constructed in 1954, storing KTF, with a capacity of 41,792 barrels;
- (9) One (1) fixed roof storage tank, identified as 404, constructed in 1953, storing KTF, with a capacity of 41,639 barrels;
- (10) One (1) fixed roof storage tank, identified as 801, constructed in 1954, storing #2 distillate oil with a low sulfur content, with a capacity of 79,088 barrels;
- (11) One (1) internal floating roof storage tank, identified as 802, constructed in 1954, storing regular unleaded gasoline, with a capacity of 2,851 barrels;
- (12) Three (3) storage tanks, identified as Phillips-Additive, Additive-KTF, and Avgas Dump Receiver, all constructed in 1991, each with a maximum capacity of 8000 gallons;
- (13) Component losses (valves, pumps, flanges, etc.); and
- (14) Meter proving.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight;
- (c) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughput less than twelve thousand (12,000) gallons;
 - (1) One (1) storage tank, identified as Additive-Diesel, constructed in 2000, with a storage capacity of 800 gallons;
 - (2) One (1) storage tank, identified as Red-Dye, constructed in 1995, with a storage capacity of 120 gallons;
- (d) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (e) Degreasing operations that do not exceed 145 gallons per 12 month;
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment;
- (g) Groundwater oil recovery wells;
- (h) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility;

- (i) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
- (j) Process vessel degassing and cleaning to prepare for internal repairs;
- (k) Paved and unpaved roads and parking lots with public access;
- (l) Asbestos abatement projects regulated by 326 IAC 14-10;
- (m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (n) On-site fire and emergency response training approved by the department;
- (o) Filter or coalescer media changeout;
- (p) A laboratory as defined in 326 IAC 2-7-1(20)(C); and
- (q) Farm operations (leased to others).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee

shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit [326 IAC 2-8-4(5)(C)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirement of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

One (1) petroleum product loading rack, constructed in 1979, with VOC emissions controlled by a vapor combustion unit, which was installed in 1994.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 VOC and HAP FESOP Limit [326 IAC 2-8]

The source shall limit the loading rack throughput to less than 240,000,000 gallons per year of gasoline, 240,000,000 gallons per year of distillates, and 630,000 gallons per year of additives. The source shall also control VOC and HAP emissions from the loading rack with the vapor combustion unit. This limitation is equivalent to limiting the emissions from the loading rack to less than 37.52 tons per twelve (12) consecutive month period and emissions of a combination of HAPs to less than 7.26 tons per twelve (12) consecutive month period. This limit is structured such that when including emissions from the storage tanks, the sump, tank cleaning, meter proving, the filter, fugitive losses, rack losses, and all insignificant activities, the source total emissions of VOC remain less than one hundred (100) tons per twelve (12) consecutive month period, emissions of a single HAP remain less than ten (10) tons per twelve consecutive month period, and emissions of a combination of HAPs remain less than twenty-five (25) tons per twelve (12) consecutive month period. These limits will render the requirements of 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

326 IAC 8-4-4 (Petroleum Sources - Bulk Gasoline Terminals) applies to this source because this source is a bulk gasoline terminal and this source is located in Hendricks County which is listed in the applicability of this rule. Pursuant to this rule, no owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:

- (a) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:
 - (1) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 mg/l of VOC to the atmosphere.
 - (2) A vapor collection system which directs all vapors to a fuel gas system or incinerator.
 - (3) An approved control system, demonstrated to have control efficiency equivalent to or greater than clause (1) above.
- (b) Displaced vapors and gases are vented only to the vapor control system.
- (c) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- (d) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

- (e) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this section.

D.1.3 Gasoline Transport [326 IAC 8-4-7]

326 IAC 8-4-7 (Petroleum Sources - Gasoline Transports) applies to this source because the source is in Hendricks County which is listed in the applicability of this rule and transfer of gasoline between transports and storage tanks takes place at the terminal. Pursuant to this rule, the owner shall not allow or permit the transfer of gasoline between transports and storage tanks that are equipped with a vapor balance system or vapor recovery system unless:

- (a) The vapor balance system or vapor recovery system is connected and operating according to manufacturers' specifications.
- (b) Gasoline transport compartment hatches are closed at all times during loading operations.
- (c) Except as provided in 326 IAC 8-4-9(i) and for sources subject to 40 CFR 60.503(b)* or 40 CFR 425(a)* requirements, there are no visible leaks, or otherwise detectable leaks (measured at twenty-one thousand (21,000) parts per million as propane as specified in 40 CFR 63.425(f)(1)*), in the gasoline transport's pressure/vacuum relief valves, hatch cover, trailer compartments, storage tanks, or associated vapor and liquid lines during loading or unloading.
- (d) The pressure relief valves on gasoline transports are set to release at no less than four and eight tenths (4.8) kilo Pascals (seven-tenths (0.7) pounds per square inch).
- (e) Tank wagons are exempt from vapor balance requirements.
- (f) When employees of the owner of a bulk gasoline terminal are present to supervise or perform loading, the owner of the terminal shall be responsible for compliance with (a), (b), and (c) above. The owner of the terminal shall also ensure that owners of gasoline transports loading at the terminal during unsupervised times comply with this rule.
- (g) Gasoline transports must be designed, maintained, and operated so as to be vapor-tight.

D.1.4 Leaks from Transports and Vapor Collection Systems [326 IAC 8-4-9]

326 IAC 8-4-9 (Petroleum Sources - Leaks from Transports and Vapor Collection Systems; Records) applies to this source because the source is in Hendricks County which is listed in the applicability of this rule and the source is subject to 326 IAC 8-4-4 and 326 IAC 8-4-7. Pursuant to this rule:

- (a) The Permittee shall not allow any gasoline transport to be filled or emptied unless the gasoline transport completes the following:
 - (1) Is tested annually according to test procedures consistent with Appendix A of "Control of Organic Compound Leaks from Gasoline Tank Trucks or and Vapor Collection Systems", EPA-450/2-78-051*, or equivalent procedure approved by the Commissioner.
 - (2) Sustains a pressure change of no more than seven hundred and fifty (750) Pascals (three (3) inches of water) in five (5) minutes when pressurized to a gauge pressure of four thousand five hundred (4,500) Pascals (eighteen (12)

- inches of water) or evacuated to a gauge pressure of one thousand five hundred (1,500) Pascals (six (6) inches of water) during the testing required subdivision (1).
- (3) Is repaired by the owner or operator and retested within fifteen (15) days of testing if it does not meet the criteria of subdivision (2).
- (b) The Permittee shall operate the vapor control system and the gasoline loading rack in a manner that prevents:
- (1) Gauge pressure from exceeding four thousand five hundred (4,500) Pascals (eighteen (18) inches of water) and a vacuum from exceeding one thousand five hundred (1,500) Pascals (six (6) inches of water) in the gasoline tank truck.
- (2) A reading equal to or greater than one hundred percent (100%) of the lower explosive limit (LEL, measured as propane) at two and five-tenths (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in Appendix B of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA 450/2-78-051, or an equivalent procedure approved by the Commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals.
- (3) Avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals.
- (c) The Permittee shall repair and retest a vapor collection or control system that exceeds the limits in condition (b) within fifteen (15) days.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

In order to comply with Conditions D.1.1, D.1.2, D.1.3, and D.1.4, the vapor combustion unit for VOC control shall be in operation at all times when loading operations are taking place

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the flare shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.8 Monitoring

- (a) The loading rack and vapor combustion unit shall be equipped with controls that allow petroleum product loading only when a flame is detected within the vapor combustion unit. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the loading rack gasoline, distillates, and additives throughput. The records shall be complete and sufficient to establish compliance with the loading rack throughput limits established in Condition D.1.1.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of all certification testing. The records shall identify the following:
 - (1) The vapor balance, vapor collection, or vapor control system.
 - (2) The date of the test and, if applicable, retest.
 - (3) The results of the test and, if applicable, retest.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the flare exhaust.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
- (1) One (1) internal floating roof storage tank, identified as 031, constructed in 1954, storing transmix, with a capacity of 2,851 barrels;
 - (2) One (1) internal floating roof storage tank, identified as 201, constructed in 1953, storing kerosene, with a capacity of 17,973 barrels;
 - (3) One (1) internal floating roof storage tank, identified as 202, constructed in 1953, storing av-gasoline, with a capacity of 17,720 barrels;
 - (4) One (1) internal floating roof storage tank, identified as 203, constructed in 1953, storing av-gasoline, with a capacity of 12,500 barrels;
 - (5) One (1) internal floating roof storage tank, identified as 204, constructed in 1953, storing regular unleaded gasoline, with a capacity of 17,723 barrels;
 - (6) One (1) fixed roof storage tank, identified as 401, constructed in 1953, storing #2 distillate oil with a high sulfur content, with a capacity of 41,679 barrels;
 - (7) One (1) internal floating roof storage tank, identified as 402, constructed in 1953, storing premium unleaded gasoline, with a capacity of 38,812 barrels;
 - (8) One (1) fixed roof storage tank, identified as 403, constructed in 1954, storing KTF, with a capacity of 41,792 barrels;
 - (9) One (1) fixed roof storage tank, identified as 404, constructed in 1953, storing KTF, with a capacity of 41,639 barrels;
 - (10) One (1) fixed roof storage tank, identified as 801, constructed in 1954, storing #2 distillate oil with a low sulfur content, with a capacity of 79,088 barrels;
 - (11) One (1) internal floating roof storage tank, identified as 802, constructed in 1954, storing regular unleaded gasoline, with a capacity of 2,851 barrels;
 - (12) Three (3) storage tanks, identified as Phillips-Additive, Additive-KTF, and Avgas Dump Receiver, all constructed in 1991, each with a maximum capacity of 8000 gallons;
 - (13) Component losses (valves, pumps, flanges, etc.); and
 - (14) Meter proving.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Storage Vessels [326 IAC 8-4-3]

326 IAC 8-4-3 (Petroleum Sources - Petroleum Liquid Storage Facilities) applies to Tank 031, 202, 203, 204, 402, and 802 because these tanks are located in Hendricks County which is listed in the applicability of this rule. Additionally these tanks are larger than 39,000 gallons and store volatile organic compounds with true vapor pressures greater than 1.52 psia. Pursuant to this rule. No owner or operator of an external fixed roof tank shall permit the use of such facility unless:

- (a) The facility has been retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.
- (b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.
- (c) All openings, except stub drains, are equipped with covers, lids, or seals such that:
 - (1) the cover, lid, or seal is in the closed position at all times except when in actual use;
 - (2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
 - (3) rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.2 Record Keeping Requirements

- (a) To document compliance with 326 IAC 8-4-3, the Permittee shall maintain records of the types of volatile petroleum liquid stored and the maximum true vapor pressure of the liquid as stored, and the results of the inspections performed on the storage vessels.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight;
- (c) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughput less than twelve thousand (12,000) gallons;
 - (1) One (1) storage tank, identified as Additive-Diesel, constructed in 2000, with a storage capacity of 800 gallons;
 - (2) One (1) storage tank, identified as Red-Dye, constructed in 1995, with a storage capacity of 120 gallons;
- (d) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (e) Degreasing operations that do not exceed 145 gallons per 12 month;
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment;
- (g) Groundwater oil recovery wells;
- (h) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility;
- (i) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
- (j) Process vessel degassing and cleaning to prepare for internal repairs;
- (k) Paved and unpaved roads and parking lots with public access;
- (l) Asbestos abatement projects regulated by 326 IAC 14-10;
- (m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (n) On-site fire and emergency response training approved by the department;
- (o) Filter or coalescer media changeout;
- (p) A laboratory as defined in 326 IAC 2-7-1(20)(C); and
- (q) Farm operations (leased to others).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

There are no specific regulations applicable to these units.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Phillips Pipe Line Company
Source Address: 3232 N. Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 34176, Clermont, Indiana 46234
FESOP No.: F063-13882-00011

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Phillips Pipe Line Company
Source Address: 3232 N. Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 34176, Clermont, Indiana 46234
FESOP No.: F063-13882-00011

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
 CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch**

FESOP Quarterly Report

Source Name: Phillips Pipe Line Company
Source Address: 3232 N. Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 34176, Clermont, Indiana 46234
FESOP No.: F063-13882-00011
Facility: Loading Rack
Parameter: Gasoline Throughput
Limit: Less than 240,000,000 gallons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch

FESOP Quarterly Report

Source Name: Phillips Pipe Line Company
Source Address: 3232 N. Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 34176, Clermont, Indiana 46234
FESOP No.: F063-13882-00011
Facility: Loading Rack
Parameter: Distillate Throughput
Limit: Less than 240,000,000 gallons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch

FESOP Quarterly Report

Source Name: Phillips Pipe Line Company
Source Address: 3232 N. Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 34176, Clermont, Indiana 46234
FESOP No.: F063-13882-00011
Facility: Loading Rack
Parameter: Additive Throughput
Limit: Less than 630,000 gallons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Phillips Pipe Line Company
Source Address: 3232 N. Raceway Road, Clermont, Indiana 46234
Mailing Address: P.O. Box 34176, Clermont, Indiana 46234
FESOP No.: F063-13882-00011

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Phillips Pipe Line Company
Source Location: 3230 N. Raceway Road, Clermont, Indiana 46234
County: Hendricks
SIC Code: 5171
Operation Permit No.: F063-13882-00011
Permit Reviewer: ERG/KC

On July 26, 2001, the Office of Air Quality (OAQ) had a notice published in the Hendricks County Flyer in Plainfield, Indiana, stating that Phillips Pipe Line Company had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate facility, equipment with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 15, 2001, Phillips Pipe Line Company submitted comments on the proposed FESOP Renewal. The summary of the comments is as follows:

Comment 1:

According to PTE calculations and F063-5536-00011, issued December 10, 1996, tanks 031, 201, 202, 203, 204, 401, 402, 403, 404, 801, and 802 meet the requirements of an insignificant activity.

Response to 1:

IDEM agrees that these tanks are insignificant. The tanks were removed from the emission unit section of the permit and placed in the insignificant activities section as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) petroleum product loading rack, constructed in 1979, with VOC emissions controlled by a vapor combustion unit, which was installed in 1994;
- ~~(b) One (1) internal floating roof storage tank, identified as 031, constructed in 1954, storing transmix, with a capacity of 2,851 barrels;~~
- ~~(c) One (1) internal floating roof storage tank, identified as 201, constructed in 1953, storing kerosene, with a capacity of 17,973 barrels;~~
- ~~(d) One (1) internal floating roof storage tank, identified as 202, constructed in 1953, storing av-gasoline, with a capacity of 17,720 barrels;~~

- ~~(e) — One (1) internal floating roof storage tank, identified as 203, constructed in 1953, storing av-gasoline, with a capacity of 12,500 barrels;~~
- ~~(f) — One (1) internal floating roof storage tank, identified as 204, constructed in 1953, storing regular unleaded gasoline, with a capacity of 17,723 barrels;~~
- ~~(g) — One (1) fixed roof storage tank, identified as 401, constructed in 1953, storing #2 distillate oil with a high sulfur content, with a capacity of 41,679 barrels;~~
- ~~(h) — One (1) internal floating roof storage tank, identified as 402, constructed in 1953, storing premium unleaded gasoline, with a capacity of 38,812 barrels;~~
- ~~(i) — One (1) fixed roof storage tank, identified as 403, constructed in 1954, storing KTF, with a capacity of 41,792 barrels;~~
- ~~(j) — One (1) fixed roof storage tank, identified as 404, constructed in 1953, storing KTF, with a capacity of 41,639 barrels;~~
- ~~(k) — One (1) fixed roof storage tank, identified as 801, constructed in 1954, storing #2 distillate oil with a low sulfur content, with a capacity of 79,088 barrels; and~~
- ~~(l) — One (1) internal floating roof storage tank, identified as 802, constructed in 1954, storing regular unleaded gasoline, with a capacity of 2,851 barrels.~~

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- ~~(a)(e)~~ Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) One (1) internal floating roof storage tank, identified as 031, constructed in 1954, storing transmix, with a capacity of 2,851 barrels;**
 - (2) One (1) internal floating roof storage tank, identified as 201, constructed in 1953, storing kerosene, with a capacity of 17,973 barrels;**
 - (3) One (1) internal floating roof storage tank, identified as 202, constructed in 1953, storing av-gasoline, with a capacity of 17,720 barrels;**
 - (4) One (1) internal floating roof storage tank, identified as 203, constructed in 1953, storing av-gasoline, with a capacity of 12,500 barrels;**
 - (5) One (1) internal floating roof storage tank, identified as 204, constructed in 1953, storing regular unleaded gasoline, with a capacity of 17,723 barrels;**
 - (6) One (1) fixed roof storage tank, identified as 401, constructed in 1953, storing #2 distillate oil with a high sulfur content, with a capacity of 41,679 barrels;**

- (7) **One (1) internal floating roof storage tank, identified as 402, constructed in 1953, storing premium unleaded gasoline, with a capacity of 38,812 barrels;**
- (8) **One (1) fixed roof storage tank, identified as 403, constructed in 1954, storing KTF, with a capacity of 41,792 barrels;**
- (9) **One (1) fixed roof storage tank, identified as 404, constructed in 1953, storing KTF, with a capacity of 41,639 barrels;**
- (10) **One (1) fixed roof storage tank, identified as 801, constructed in 1954, storing #2 distillate oil with a low sulfur content, with a capacity of 79,088 barrels;**
- (11) **One (1) internal floating roof storage tank, identified as 802, constructed in 1954, storing regular unleaded gasoline, with a capacity of 2,851 barrels;**
- ~~(4)~~(12) Three (3) storage tanks, identified as Phillips-Additive, Additive-KTF, and Avgas Dump Receiver, all constructed in 1991, each with a maximum capacity of 8000 gallons;
- ~~(2)~~(13) Component losses (valves, pumps, flanges, etc.); and
- ~~(3)~~(14) Meter proving.

Comment 2:

The third sentence in Condition D.1.1 lists the HAP emissions from the loading rack instead of the HAP emissions from the VCU. Additionally, these values are incorrectly listed in the Potential to Emit After Issuance table in the TSD.

Response to Comment 2:

IDEM agrees that the HAP limit in Condition D.1.1 lists the emissions for the loading rack instead of the vapor recovery unit. This value was changed from 2.17 to 7.26 tons per year.

D.1.1 VOC and HAP FESOP Limit [326 IAC 2-8]

The source shall limit the loading rack throughput to less than 240,000,000 gallons per year of gasoline, 240,000,000 gallons per year of distillates, and 630,000 gallons per year of additives. The source shall also control VOC and HAP emissions from the loading rack with the vapor combustion unit. This limitation is equivalent to limiting the emissions from the loading rack to less than 37.52 tons per twelve (12) consecutive month period and emissions of a combination of HAPs to less than ~~2.17~~ **7.26** tons per twelve (12) consecutive month period. This limit is structured such that when including emissions from the storage tanks, the sump, tank cleaning, meter proving, the filter, fugitive losses, rack losses, and all insignificant activities, the source total emissions of VOC remain less than one hundred (100) tons per twelve (12) consecutive month period, emissions of a single HAP remain less than ten (10) tons per twelve consecutive month period, and emissions of a combination of HAPs remain less than twenty-five (25) tons per twelve (12) consecutive month period. These limits will render the requirements of 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-2 (Prevention of Significant Deterioration), and 40 CFR 52.21 not applicable.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Please note the following emissions:

Potential to Emit After Issuance table on page 5 of 9 of the TSD should have read as follows (differences **bolded** for emphasis):

VCU: Total HAPs: **7.26** ton/yr

Rack Losses: Total HAPs: **2.17** ton/yr

Comment 3:

No tanks at the source are external floating roof tanks. Therefore, D.1.2(b), which applies only to external floating roof tanks, should be removed from the permit since it is not applicable.

Response to Comment 3:

IDEM agrees that since no external floating roof tanks exist at the source, D.1.2(b) should be removed. D.1.2 becomes D.2.1 in the revised permit.

D.1.2 Storage Vessels [326 IAC 8-4-3]

326 IAC 8-4-3 (Petroleum Sources - Petroleum Liquid Storage Facilities) applies to Tank 031, 202, 203, 204, 402, and 802 because these tanks are located in Hendricks County which is listed in the applicability of this rule. Additionally these tanks are larger than 39,000 gallons and store volatile organic compounds with true vapor pressures greater than 1.52 psia. Pursuant to this rule

~~(a)~~ No owner or operator of an external fixed roof tank shall permit the use of such facility unless:

~~(1)~~ (a) The facility has been retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.

~~(2)~~ (b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.

~~(3)~~ (c) All openings, except stub drains, are equipped with covers, lids, or seals such that:

~~(A)~~ (1) the cover, lid, or seal is in the closed position at all times except when in actual use;

~~(B)~~ (2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;

~~(C)~~ (3) rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

~~(b)~~ No owner or operator of an external floating roof tank shall permit the use of such facility unless:

~~(1)~~ The facility has been fitted with:

~~(A)~~ a continuous secondary seal extending from the floating roof to the tank wall (rim-mounted secondary seal); or

- ~~(B) — a closure or other device approved by the commissioner which is equally effective.~~
- ~~(2) — All seal closure devices meet the following requirements:~~
 - ~~(A) — there are no visible holes, tears, or other openings in the seal(s) or seal fabric;~~
 - ~~(B) — the seal(s) are intact and uniformly in place around the circumference of the floating roof between the floating roof and the tank wall.~~
 - ~~(C) — for vapor mounted primary seals, the accumulated gap area around the circumference of the secondary seal where a gap exceeding one-eighth (1/8) inch exists between the secondary seal and the tank wall shall not exceed 1.0 square inch per foot of tank diameter. There shall be no gaps exceeding one-half (1/2) inch between the secondary seal and the tank wall of welded tanks and no gaps exceeding one (1) inch between the secondary seal and the tank wall of riveted tanks.~~
- ~~(3) — All openings in the external floating roof, except for automatic bleeder vents, rim space vents, and leg sleeves, are:~~
 - ~~(A) — equipped with covers, seals, or lids in the closed position except when the openings are in actual use; and~~
 - ~~(B) — equipped with projections into the tank which remain below the liquid surface at all times.~~
- ~~(4) — Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;~~
- ~~(5) — Rim vents are set to open when the roof is being floated off the leg supports or at the manufacturer's recommended setting; and~~
- ~~(6) — Emergency roof drains are provided with slotted membrane fabric covers or equivalent covers which cover at least ninety percent (90%) of the area of the opening.~~

Comment 4:

Section (a) of Condition D.1.9 states that the permittee shall conduct quarterly inspections of tanks 031, 202, 203, 204, 402, and 802 for visible holes, tears or other openings in the seal or any seal fabric or materials. There is no requirement for quarterly inspections according to the regulations listed in this permit.

Response to Comment 4:

IDEM agrees that even though inspections are necessary to be in compliance with 326 IAC 8-4-3, there is no specific requirement in the regulations for quarterly inspections. This requirement was removed from the permit. The record keeping requirement in Condition D.1.10 that corresponds with D.1.9 (a) was also removed. D.1.9 Monitoring becomes D.1.8 in the revised permit.

D.1.9 Monitoring

- ~~(a) — The Permittee shall conduct quarterly inspections of Tank 031, 202, 203, 204, 402, and 802 for visible holes, tears, or other openings in the seal or any seal fabric or materials.~~

- ~~(b)~~ (a) The loading rack and vapor combustion unit shall be equipped with controls that allow petroleum product loading only when a flame is detected within the vapor combustion unit. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- ~~(c)~~ (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the loading rack gasoline, distillates, and additives throughput. The records shall be complete and sufficient to establish compliance with the loading rack throughput limits established in Condition D.1.1.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records of the types of volatile petroleum liquid stored and the maximum true vapor pressure of the liquid as stored.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of all certification testing. The records shall identify the following:
 - (1) The vapor balance, vapor collection, or vapor control system.
 - (2) The date of the test and, if applicable, retest.
 - (3) The results of the test and, if applicable, retest.
- (d) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of the flare exhaust.
- ~~(e) To document compliance with Condition D.1.9(a), the Permittee shall maintain a record of the results of the inspections performed on the storage vessels.~~
- (f) (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 5:

Section (b) of D.1.10 states that to document compliance with Condition D.1.2, the Permittee shall maintain records of the types of volatile petroleum liquid stored and the maximum true vapor pressure of the liquid stored. Condition D.1.2 does not address the requirements listed in Condition D.1.10(b).

Response to Comment 5:

Condition D.1.2 does not specifically mention the record keeping requirements of 326 IAC 8-4-3 because it is in the Emission Limitations and Standards section of the permit. However, these requirements do exist. Therefore they will remain in the permit, but the reference to the rule rather than the permit condition will be inserted into the requirement in order to minimize confusion. Additionally, the requirement to keep records of the inspections performed on the tanks as specified in 326 IAC 8-4-3 will be added to this condition.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the loading rack gasoline, distillates, and additives throughput. The records shall be complete and sufficient to establish compliance with the loading rack throughput limits established in Condition D.1.1.
- (b) To document compliance with ~~Condition D.1.2~~ **326 IAC 8-4-3**, the Permittee shall maintain records of the types of volatile petroleum liquid stored, ~~and~~ the maximum true vapor pressure of the liquid as stored, **and the results of the inspections performed on the storage vessels.**
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of all certification testing. The records shall identify the following:
 - (1) The vapor balance, vapor collection, or vapor control system.
 - (2) The date of the test and, if applicable, retest.
 - (3) The results of the test and, if applicable, retest.
- (d) To document compliance with Condition D.1.8, the Permittee shall maintain records of daily visible emission notations of the flare exhaust.
- (e) To document compliance with Condition D.1.9(a), the Permittee shall maintain a record of the results of the inspections performed on the storage vessels.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Upon further review, The OAQ has decided to make the following changes to the Permit:

1. For organizational purposes and since Comment 1 from Phillips Pipe Line resulted in moving units to the insignificant activities section, the following changes were made to Condition A.3:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- ~~(a)~~ **(a)** Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) One (1) internal floating roof storage tank, identified as 031, constructed in 1954, storing transmix, with a capacity of 2,851 barrels;**
 - (2) One (1) internal floating roof storage tank, identified as 201, constructed in 1953, storing kerosene, with a capacity of 17,973 barrels;**
 - (3) One (1) internal floating roof storage tank, identified as 202, constructed in 1953, storing av-gasoline, with a capacity of 17,720 barrels;**

- (4) One (1) internal floating roof storage tank, identified as 203, constructed in 1953, storing av-gasoline, with a capacity of 12,500 barrels;**
- (5) One (1) internal floating roof storage tank, identified as 204, constructed in 1953, storing regular unleaded gasoline, with a capacity of 17,723 barrels;**
- (6) One (1) fixed roof storage tank, identified as 401, constructed in 1953, storing #2 distillate oil with a high sulfur content, with a capacity of 41,679 barrels;**
- (7) One (1) internal floating roof storage tank, identified as 402, constructed in 1953, storing premium unleaded gasoline, with a capacity of 38,812 barrels;**
- (8) One (1) fixed roof storage tank, identified as 403, constructed in 1954, storing KTF, with a capacity of 41,792 barrels;**
- (9) One (1) fixed roof storage tank, identified as 404, constructed in 1953, storing KTF, with a capacity of 41,639 barrels;**
- (10) One (1) fixed roof storage tank, identified as 801, constructed in 1954, storing #2 distillate oil with a low sulfur content, with a capacity of 79,088 barrels;**
- (11) One (1) internal floating roof storage tank, identified as 802, constructed in 1954, storing regular unleaded gasoline, with a capacity of 2,851 barrels;**
- ~~(4)~~**(12)** Three (3) storage tanks, identified as Phillips-Additive, Additive-KTF, and Avgas Dump Receiver, all constructed in 1991, each with a maximum capacity of 8000 gallons;
- ~~(2)~~**(13)** Component losses (valves, pumps, flanges, etc.); ~~and~~
- ~~(3)~~**(14)** Meter proving.
- ~~(a)~~ **(b)** Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight;
- ~~(b)~~ **(c)** Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughput less than twelve thousand (12,000) gallons;
 - (1) One (1) storage tank, identified as Additive-Diesel, constructed in 2000, with a storage capacity of 800 gallons;**
 - (2) One (1) storage tank, identified as Red-Dye, constructed in 1995, with a storage capacity of 120 gallons;**
- ~~(c)~~ **(d)** Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- ~~(d)~~ **(e)** Degreasing operations that do not exceed 145 gallons per 12 month;
- ~~(e)~~ **(f)** The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment;

- ~~(f)~~ **(g)** Groundwater oil recovery wells;
- ~~(g)~~ **(h)** Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility;
- ~~(h)~~ **(i)** Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
- ~~(i)~~ **(j)** Process vessel degassing and cleaning to prepare for internal repairs;
- ~~(j)~~ **(k)** Paved and unpaved roads and parking lots with public access;
- ~~(k)~~ **(l)** Asbestos abatement projects regulated by 326 IAC 14-10;
- ~~(l)~~ **(m)** Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- ~~(m)~~ **(n)** On-site fire and emergency response training approved by the department;
- ~~(n)~~ **(o)** Filter or coalescer media changeout;
- ~~(o)~~ **(p)** A laboratory as defined in 326 IAC 2-7-1(20)(C); **and**
- ~~(p)~~ **(q)** Farm operations (leased to others); **and**
- ~~(q)~~ — Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - ~~(1)~~ — Three (3) storage tanks, identified as Phillips Additive, Additive-KTF, and Avgas Dump Receiver, all constructed in 1991, each with a maximum capacity of 8000 gallons;
 - ~~(2)~~ — Component losses (valves, pumps, flanges, etc.); **and**
 - ~~(3)~~ — Meter proving.

2. B.10 Compliance with Permit Conditions. This section has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the permittee's application to renew the permit.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- ~~(a)~~ **(a)** The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, ~~except those specifically designated as not federally enforceable,~~ is grounds for:
 - ~~(1)~~ **(1)** Enforcement action;

- (2) Permit termination, revocation and reissuance, or modification; and
- (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions

B.10 Permit Revision Requirement. IDEM, OAQ made the following corrections:

B.10 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1

- 3. The name Compliance Data Section was updated to Compliance Branch.
- 4. For organizational purposes and since Comment 1 from Phillips Pipe Line resulted in moving units to the insignificant activities section, the following changes were made to the Facility Description portion of Section D.1:

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) petroleum product loading rack, constructed in 1979, with VOC emissions controlled by a vapor combustion unit, which was installed in 1994.
- ~~(b) One (1) internal floating roof storage tank, identified as 031, constructed in 1954, storing transmix, with a capacity of 2,851 barrels;~~
- ~~(c) One (1) internal floating roof storage tank, identified as 201, constructed in 1953, storing kerosene, with a capacity of 17,973 barrels;~~
- ~~(d) One (1) internal floating roof storage tank, identified as 202, constructed in 1953, storing av-gasoline, with a capacity of 17,720 barrels;~~
- ~~(e) One (1) internal floating roof storage tank, identified as 203, constructed in 1953, storing av-gasoline, with a capacity of 12,500 barrels;~~
- ~~(f) One (1) internal floating roof storage tank, identified as 204, constructed in 1953, storing regular unleaded gasoline, with a capacity of 17,723 barrels;~~
- ~~(g) One (1) fixed roof storage tank, identified as 401, constructed in 1953, storing #2 distillate oil with a high sulfur content, with a capacity of 41,679 barrels;~~
- ~~(h) One (1) internal floating roof storage tank, identified as 402, constructed in 1953, storing premium unleaded gasoline, with a capacity of 38,812 barrels;~~
- ~~(i) One (1) fixed roof storage tank, identified as 403, constructed in 1954, storing KTF, with a capacity of 41,792 barrels;~~

(j)	One (1) fixed roof storage tank, identified as 404, constructed in 1953, storing KTF, with a capacity of 41,639 barrels;
(k)	One (1) fixed roof storage tank, identified as 801, constructed in 1954, storing #2 distillate oil with a low sulfur content, with a capacity of 79,088 barrels; and
(l)	One (1) internal floating roof storage tank, identified as 802, constructed in 1954, storing regular unleaded gasoline, with a capacity of 2,851 barrels.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

5. Since all the tanks were removed from Section D.1, Condition D.1.2 was removed from Section D.1. Condition numbering was also changed as a result of this deletion.

D.1.2 Storage Vessels [326 IAC 8-4-3]

~~326 IAC 8-4-3 (Petroleum Sources - Petroleum Liquid Storage Facilities) applies to Tank 031, 202, 203, 204, 402, and 802 because these tanks are located in Hendricks County which is listed in the applicability of this rule. Additionally these tanks are larger than 39,000 gallons and store volatile organic compounds with true vapor pressures greater than 1.52 psia. Pursuant to this rule~~

- ~~(a) The facility has been retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.~~
- ~~(b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.~~
- ~~(c) All openings, except stub drains, are equipped with covers, lids, or seals such that:~~
- ~~(1) the cover, lid, or seal is in the closed position at all times except when in actual use;~~
 - ~~(2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;~~
 - ~~(3) rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.~~

D.1.32 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

~~326 IAC 8-4-4 (Petroleum Sources - Bulk Gasoline Terminals) applies to this source because this source is a bulk gasoline terminal and this source is located in Hendricks County which is listed in the applicability of this rule. Pursuant to this rule, no owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:~~

D.1.43 Gasoline Transport [326 IAC 8-4-7]

~~326 IAC 8-4-7 (Petroleum Sources - Gasoline Transports) applies to this source because the source is in Hendricks County which is listed in the applicability of this rule and transfer of gasoline between transports and storage tanks takes place at the terminal. Pursuant to this rule, the owner shall not allow or permit the transfer of gasoline between transports and storage tanks that are equipped with a vapor balance system or vapor recovery system unless:~~

D.1.54 Leaks from Transports and Vapor Collection Systems [326 IAC 8-4-9]

326 IAC 8-4-9 (Petroleum Sources - Leaks from Transports and Vapor Collection Systems; Records) applies to this source because the source is in Hendricks County which is listed in the applicability of this rule and the source is subject to 326 IAC 8-4-4 and 326 IAC 8-4-7. Pursuant to this rule:

D.1.65 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.76 Volatile Organic Compounds (VOC)

In order to comply with Conditions D.1.1, D.1.32, D.1.43, and D.1.54, the vapor combustion unit for VOC control shall be in operation at all times when loading operations are taking place

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.87 Visible Emissions Notations

- (a) Daily visible emission notations of the flare shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

D.1.98 Monitoring

- (a) The loading rack and vapor combustion unit shall be equipped with controls that allow petroleum product loading only when a flame is detected within the vapor combustion unit. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.109 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the loading rack gasoline, distillates, and additives throughput. The records shall be complete and sufficient to establish compliance with the loading rack throughput limits established in Condition D.1.1.
- (b) To document compliance with Condition D.1.54, the Permittee shall maintain records of all certification testing. The records shall identify the following:
 - (1) The vapor balance, vapor collection, or vapor control system.
 - (2) The date of the test and, if applicable, retest.
 - (3) The results of the test and, if applicable, retest.
- (c) To document compliance with Condition D.1.87, the Permittee shall maintain records of daily visible emission notations of the flare exhaust.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.1110 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

5. A new section D.2 was created for the tanks that were moved from Section D.1

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
- (1) One (1) internal floating roof storage tank, identified as 031, constructed in 1954, storing transmix, with a capacity of 2,851 barrels;
 - (2) One (1) internal floating roof storage tank, identified as 201, constructed in 1953, storing kerosene, with a capacity of 17,973 barrels;
 - (3) One (1) internal floating roof storage tank, identified as 202, constructed in 1953, storing av-gasoline, with a capacity of 17,720 barrels;
 - (4) One (1) internal floating roof storage tank, identified as 203, constructed in 1953, storing av-gasoline, with a capacity of 12,500 barrels;
 - (5) One (1) internal floating roof storage tank, identified as 204, constructed in 1953, storing regular unleaded gasoline, with a capacity of 17,723 barrels;
 - (6) One (1) fixed roof storage tank, identified as 401, constructed in 1953, storing #2 distillate oil with a high sulfur content, with a capacity of 41,679 barrels;
 - (7) One (1) internal floating roof storage tank, identified as 402, constructed in 1953, storing premium unleaded gasoline, with a capacity of 38,812 barrels;
 - (8) One (1) fixed roof storage tank, identified as 403, constructed in 1954, storing KTF, with a capacity of 41,792 barrels;
 - (9) One (1) fixed roof storage tank, identified as 404, constructed in 1953, storing KTF, with a capacity of 41,639 barrels;
 - (10) One (1) fixed roof storage tank, identified as 801, constructed in 1954, storing #2 distillate oil with a low sulfur content, with a capacity of 79,088 barrels;

- (11) One (1) internal floating roof storage tank, identified as 802, constructed in 1954, storing regular unleaded gasoline, with a capacity of 2,851 barrels;
- (12) Three (3) storage tanks, identified as Phillips-Additive, Additive-KTF, and Avgas Dump Receiver, all constructed in 1991, each with a maximum capacity of 8000 gallons;
- (13) Component losses (valves, pumps, flanges, etc.); and
- (14) Meter proving.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Storage Vessels [326 IAC 8-4-3]

326 IAC 8-4-3 (Petroleum Sources - Petroleum Liquid Storage Facilities) applies to Tank 031, 202, 203, 204, 402, and 802 because these tanks are located in Hendricks County which is listed in the applicability of this rule. Additionally these tanks are larger than 39,000 gallons and store volatile organic compounds with true vapor pressures greater than 1.52 psia. Pursuant to this rule. No owner or operator of an external fixed roof tank shall permit the use of such facility unless:

- (a) The facility has been retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall unless the source has been retrofitted with equally effective alternative control which has been approved.
- (b) The facility is maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials.
- (c) All openings, except stub drains, are equipped with covers, lids, or seals such that:
 - (1) the cover, lid, or seal is in the closed position at all times except when in actual use;
 - (2) automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports;
 - (3) rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.2 Record Keeping Requirements

- (a) To document compliance with 326 IAC 8-4-3, the Permittee shall maintain records of the types of volatile petroleum liquid stored and the maximum true vapor pressure of the liquid as stored, and the results of the inspections performed on the storage vessels.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

6. Condition D.1.5(a)(4) is no longer current or applicable. Therefore it was removed from the permit.

D.1.5 Leaks from Transports and Vapor Collection Systems [326 IAC 8-4-9]

326 IAC 8-4-9 (Petroleum Sources - Leaks from Transports and Vapor Collection Systems; Records) applies to this source because the source is in Hendricks County which is listed in the applicability of this rule and the source is subject to 326 IAC 8-4-4 and 326 IAC 8-4-7. Pursuant to this rule:

(a) The Permittee shall not allow any gasoline transport to be filled or emptied unless the gasoline transport completes the following:

- (1) Is tested annually according to test procedures consistent with Appendix A of "Control of Organic Compound Leaks from Gasoline Tank Trucks or and Vapor Collection Systems", EPA-450/2-78-051*, or equivalent procedure approved by the Commissioner.
- (2) Sustains a pressure change of no more than seven hundred and fifty (750) Pascals (three (3) inches of water) in five (5) minutes when pressurized to a gauge pressure of four thousand five hundred (4,500) Pascals (eighteen (12) inches of water) or evacuated to a gauge pressure of one thousand five hundred (1,500) Pascals (six (6) inches of water) during the testing required subdivision (1).
- (3) Is repaired by the owner or operator and retested within fifteen (15) days of testing if it does not meet the criteria of subdivision (2).
- ~~(4) Displays a sticker that shows the date that the gasoline tank truck last passed the test require in subdivisions (1) through (2). Such sticker shall be displayed near the Department of Transportation Certification Plate required by 49 CFR 178.340-10b.~~

7. For organizational purposes and since Comment 1 from Phillips Pipe Line resulted in moving units to the insignificant activities section, changes were made to the Facility Description portion of Section D.2. This section was also moved to Section D.3 since a new D.2 was inserted.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- ~~(a)~~**(b)** Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight;
- ~~(b)~~**(c)** Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughput less than twelve thousand (12,000) gallons;
- (1) One (1) storage tank, identified as Additive-Diesel, constructed in 2000, with a storage capacity of 800 gallons;
 - (2) One (1) storage tank, identified as Red-Dye, constructed in 1995, with a storage capacity of 120 gallons;

- ~~(e)~~(d) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- ~~(d)~~(e) Degreasing operations that do not exceed 145 gallons per 12 month;
- ~~(e)~~(f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment;
- ~~(f)~~(g) Groundwater oil recovery wells;
- ~~(g)~~(h) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility;
- ~~(h)~~(i) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
- ~~(i)~~(j) Process vessel degassing and cleaning to prepare for internal repairs;
- ~~(j)~~(k) Paved and unpaved roads and parking lots with public access;
- ~~(k)~~(l) Asbestos abatement projects regulated by 326 IAC 14-10;
- ~~(l)~~(m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- ~~(m)~~(n) On-site fire and emergency response training approved by the department;
- ~~(n)~~(o) Filter or coalescer media changeout;
- ~~(o)~~(p) A laboratory as defined in 326 IAC 2-7-1(20)(C); **and**
- ~~(p)~~ (q) Farm operations (leased to others). **and**
- ~~(q)~~ — Emission units with PM and PM₁₀ emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - ~~(1)~~ — Three (3) storage tanks, identified as Phillips Additive, Additive-KTF, and Avgas Dump Receiver, all constructed in 1991, each with a maximum capacity of 8000 gallons;
 - ~~(2)~~ — Component losses (valves, pumps, flanges, etc.); **and**
 - ~~(3)~~ — Meter proving.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Phillips Pipe Line Company
Source Location: 3230 N. Raceway Road, Clermont, Indiana 46234
County: Hendricks
SIC Code: 5171
Operation Permit No.: F063-13882-00011
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Phillips Pipe Line Company relating to the operation of a petroleum products terminal. Phillips Pipe Line Company was issued FESOP (F063-5536-00011) on December 10, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) petroleum product loading rack, constructed in 1979, with VOC emissions controlled by a vapor combustion unit, which was installed in 1994;
- (b) One (1) internal floating roof storage tank, identified as 031, constructed in 1954, storing transmix, with a capacity of 2,851 barrels;
- (c) One (1) internal floating roof storage tank, identified as 201, constructed in 1953, storing kerosene, with a capacity of 17,973 barrels;
- (d) One (1) internal floating roof storage tank, identified as 202, constructed in 1953, storing av-gasoline, with a capacity of 17,720 barrels;
- (e) One (1) internal floating roof storage tank, identified as 203, constructed in 1953, storing av-gasoline, with a capacity of 12,500 barrels;
- (f) One (1) internal floating roof storage tank, identified as 204, constructed in 1953, storing regular unleaded gasoline, with a capacity of 17,723 barrels;
- (g) One (1) fixed roof storage tank, identified as 401, constructed in 1953, storing #2 distillate oil with a high sulfur content, with a capacity of 41,679 barrels;
- (h) One (1) internal floating roof storage tank, identified as 402, constructed in 1953, storing premium unleaded gasoline, with a capacity of 38,812 barrels;
- (i) One (1) fixed roof storage tank, identified as 403, constructed in 1954, storing KTF, with a capacity of 41,792 barrels;

- (j) One (1) fixed roof storage tank, identified as 404, constructed in 1953, storing KTF, with a capacity of 41,639 barrels;
- (k) One (1) fixed roof storage tank, identified as 801, constructed in 1954, storing #2 distillate oil with a low sulfur content, with a capacity of 79,088 barrels; and
- (l) One (1) internal floating roof storage tank, identified as 802, constructed in 1954, storing regular unleaded gasoline, with a capacity of 2,851 barrels.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this renewal review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new emission units and pollution control equipment receiving new source review approval at this source during this renewal review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight;
- (b) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughput less than twelve thousand (12,000) gallons;
 - (1) One (1) storage tank, identified as Additive-Diesel, constructed in 2000, with a storage capacity of 800 gallons;
 - (2) One (1) storage tank, identified as Red-Dye, constructed in 1995, with a storage capacity of 120 gallons;
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (d) Degreasing operations that do not exceed 145 gallons per 12 month;
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment;
- (f) Groundwater oil recovery wells;
- (g) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility;
- (h) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
- (i) Process vessel degassing and cleaning to prepare for internal repairs;
- (j) Paved and unpaved roads and parking lots with public access;

- (k) Asbestos abatement projects regulated by 326 IAC 14-10;
- (l) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (m) On-site fire and emergency response training approved by the department;
- (n) Filter or coalescer media changeout;
- (o) A laboratory as defined in 326 IAC 2-7-1(20)(C);
- (p) Farm operations (leased to others); and
- (q) Emission units with PM and PM10 emissions less than five (5) tons per year, SO₂, NO_x, and VOC emissions less than ten (10) tons per year, CO emissions less than twenty-five (25) tons per year, lead emissions less than two-tenths (0.2) tons per year, single HAP emissions less than one (1) ton per year, and combination of HAPs emissions less than two and a half (2.5) tons per year:
 - (1) Three (3) storage tanks, identified as Phillips-Additive, Additive-KTF, and Avgas Dump Receiver, all constructed in 1991, each with a maximum capacity of 8000 gallons;
 - (2) Component losses (valves, pumps, flanges, etc.); and
 - (3) Meter proving.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

F063-5536-00011, issued on December 10, 1996, expiring on December 10, 2001

All conditions from previous approvals were incorporated into this renewal FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on February 2, 2001.

Emission Calculations

All emissions were taken from the original FESOP (F063-5536-00011).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	0
PM-10	0
SO ₂	0
VOC	918
CO	0
NO _x	0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
MTBE	121
Others	52
TOTAL	173

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP). This source has chosen to limit the emissions of VOC to less than one hundred (100) tons per twelve (12) consecutive month period, the emissions of single HAPs to below ten (10) tons per twelve (12) consecutive month period, and the emissions of any combination of HAPs to below twenty-five (25) tons per twelve (12) consecutive month period. This limitation will render the requirements of 326 IAC 2-7 not applicable.
- (d) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 10, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F063-5536-00011; issued on December 10, 1996).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO ₂	VOC	CO	NO _x	Total HAPs
VCU	0	0	0	37.52	0	0	2.17
Storage Tanks	0	0	0	28.08	0	0	5.33
Rack Losses	0	0	0	11.24	0	0	7.26
Tank Cleaning	0	0	0	4.6	0	0	0.89
Fugitive	0	0	0	0.69	0	0	0.53
Meter Proving	0	0	0	0.16	0	0	0.031
Sump	0	0	0	0.01	0	0	0.003
Filter	0	0	0	0.01	0	0	0.002
All Insignificant Activities	0	0	0	16.71	0	0	Less than 8
Total PTE After Issuance	0	0	0	Less than 100	0	0	Less than 25

County Attainment Status

The source is located in Hendricks County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Hendricks County has been designated as attainment or unclassifiable for ozone.
- (b) Hendricks County has been classified as attainment or unclassifiable for PM10, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) applicable to this source. New Source Performance Standard (NSPS), 40 CFR 60, Subpart K (326 IAC 12) - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and prior to May 19, 1978, 40 CFR 60, Subpart Ka (326 IAC 12) - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May

18, 1978 and prior to July 23, 1984, or 40 CFR 60, Subpart Kb (326 IAC 12) - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 because the storage tanks were constructed in 1953 and 1954 which is before the applicability date of these rules. 40 CFR 60, Subpart XX (326 IAC 12) - Standards of Performance for Bulk Gasoline Terminals does not apply to this source because the loading rack was constructed prior to the applicability date of December 17, 1980 for this rule.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source. This source is not subject to the requirements of 40 CFR Part 63, Subpart R because this rule applies to sources that are a major source for HAPs. This source is not a major source for HAPs because it is limiting HAP emissions to less than ten (10) tons per twelve (12) consecutive month period for a single HAP and less than twenty-five (25) tons per twelve (12) consecutive month period of any combination of HAPs.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The FESOP limit on loading of materials will also make the source minor for PSD. Therefore, this will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Hendricks County and the potential to emit VOC is limited to less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP)

The source shall limit the loading rack throughput to less than 240,000,000 gallons per year of gasoline, 240,000,000 gallons per year of distillates, and 630,000 gallons per year of additives. The source shall also control VOC and HAP emissions from the loading rack with the vapor combustion unit. This limitation is equivalent to limiting the emissions from the loading rack to less than 37.52 tons per twelve (12) consecutive month period and emissions of a combination of HAPs to less than 2.17 tons per twelve (12) consecutive month period. This limit is structured such that when including emissions from the storage tanks, the sump, tank cleaning, meter proving, the filter, fugitive losses, rack losses, and all insignificant activities, the source total emissions of VOC remain less than one hundred (100) tons per twelve (12) consecutive month period, emissions of a single HAP remain less than ten (10) tons per twelve consecutive month period, and emissions of a combination of HAPs remain less than twenty-five (25) tons per twelve (12) consecutive month period. These limits will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to the original FESOP (F063-5536-00011), 326 IAC 5-1-2 (Opacity Limitations) is applicable in order to replace testing requirements. Pursuant to this rule, except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Process Operations)

326 IAC 6-3-2 (Process Operations) does not apply to this source because this source does not emit any particulate matter.

326 IAC 8-4-2 (Petroleum Sources - Petroleum Refineries)

326 IAC 8-4-2 (Petroleum Sources - Petroleum Refineries) does not apply to this source even though the source is in Hendricks County which is listed in the applicability of this rule because this source is not a petroleum refinery. This source just stores petroleum compounds.

326 IAC 8-4-3 (Petroleum Sources - Petroleum Liquid Storage Facilities)

(a) 326 IAC 8-4-3 (Petroleum Sources - Petroleum Liquid Storage Facilities) applies to Tank 031, 202, 203, 204, 402, and 802 because these tanks are located in Hendricks County which is listed in the applicability of this rule. Additionally these tanks are larger than 39,000 gallons and store volatile organic compounds with true vapor pressures greater than 1.52 psia.

(b) 326 IAC 8-4-3 (Petroleum Sources - Petroleum Liquid Storage Facilities) does not apply to Tank 201, 401, 403, 404, and 801 even though these tanks are located in Hendricks County which is listed in the applicability of this rule and these tanks are larger than 39,000 gallons because they store volatile organic compounds with true vapor pressures less than 1.52 psia.

326 IAC 8-4-4 (Petroleum Sources - Bulk Gasoline Terminals)

326 IAC 8-4-4 (Petroleum Sources - Bulk Gasoline Terminals) applies to this source because this source is a bulk gasoline terminal and this source is located in Hendricks County which is listed in the applicability of this rule.

326 IAC 8-4-5 (Petroleum Sources - Bulk Gasoline Plants)

326 IAC 8-4-5 (Petroleum Sources - Bulk Gasoline Plants) does not apply to this source even though the source is in Hendricks County which is listed in the applicability of this rule because this source is not a bulk gasoline plant. This source just stores petroleum compounds.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

326 IAC 8-4-6 (Gasoline Dispensing Facilities) does not apply to this source even though the source is in Hendricks County which is listed in the applicability of this rule because this source does not dispense gasoline into motor vehicle fuel tanks or portable container. This source dispenses gasoline into trucks which transport the gasoline to various gasoline dispensing facilities.

326 IAC 8-4-7 (Petroleum Sources - Gasoline Transports)

326 IAC 8-4-7 (Petroleum Sources - Gasoline Transports) applies to this source because it is in Hendricks County and gasoline is transferred between transports and storage tanks at the source.

326 IAC 8-4-8 (Petroleum Sources - Leaks from Petroleum Refineries; Monitoring; Reports)

326 IAC 8-4-8 (Petroleum Sources - Leaks from Petroleum Refineries; Monitoring; Reports) does not apply to this source even though the source is in Hendricks County which is listed in the applicability of this rule because this source is not a Petroleum Refinery. This source just stores petroleum compounds.

326 IAC 8-4-9 (Petroleum Sources - Leaks from Transports and Vapor Collection Systems; Records)

326 IAC 8-4-9 (Petroleum Sources - Leaks from Transports and Vapor Collection Systems; Records) applies to this source because the source is in Hendricks County which is listed in the applicability of this rule because sections 4 of this rule applies to this source.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) does not apply to this source because this source is located in Hendricks County and this rule applies to sources located in Clark, Floyd, Lake, or Porter County.

Testing Requirements

Testing was not required in the original FESOP and will not be required in this permit because there is no evidence that any of the units are out of compliance with any of the applicable requirements. Pursuant to the original FESOP (F063-5536-00011), daily visible emission notations will be added in place of testing requirements.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. The storage tanks have applicable compliance monitoring conditions as specified below:
 - (a) The Permittee shall conduct quarterly inspections of Tank 55-1, 45-2, and 25-4 for visible holes, tears, or other openings in the seal or any seal fabric or materials.
2. The vapor combustion unit has applicable compliance monitoring conditions as specified below:
 - (a) The loading rack and vapor combustion unit shall be equipped with controls that allow petroleum product loading only when a flame is detected within the vapor combustion unit. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

- (b) Daily visible emissions notations of the flare shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the vapor combustion unit for the loading rack must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).

Conclusion

The operation of this petroleum products terminal shall be subject to the conditions of the attached proposed renewal FESOP No.: 063-13882-00011.